

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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PRISCILLA BORGES,

CASE NO.

Plaintiff,

vs.

TRANSUNION LLC, EQUIFAX INFORMATION  
SERVICES, LLC, and EXPERIAN INFORMATION  
SOLUTIONS, INC.,

Defendants.

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**TRANS UNION, LLC'S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the Court of Common Pleas, State Of Delaware In And For New Castle County, to the United States District Court District Of Delaware, on the following grounds:

1. Plaintiff Priscilla Borges served Trans Union on or about April 14, 2025, with Correspondence from Plaintiff to Trans Union LLC (“Plaintiff’s Correspondence”), Summons to Trans Union (“Summons”), and a Complaint (“Complaint”), filed in the Court of Common Pleas, State Of Delaware In And For New Castle County. Copies of Plaintiff’s Correspondence, Summons and Complaint are attached hereto as **Exhibit A**, **Exhibit B**, and **Exhibit C**, respectively. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the “FCRA”). See generally Complaint.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Court of Common Pleas, State Of Delaware In And For New Castle County, to the United States District Court District Of Delaware.

5. As of the date of this Notice Of Removal, Defendant Experian Information Solutions, Inc., (“Experian”) and Equifax Information Services, LLC (“Equifax”) have not been served. Counsel for Trans Union has contacted counsel and/or corporate representatives for the Defendants Experian and Equifax and they have told Trans Union that they have yet to be served. To the best of Trans Union’s knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the Court of Common Pleas, State Of Delaware In And For New Castle County, and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Court of Common Pleas, State Of Delaware In And For New Castle County, to this United States District Court, District Of Delaware.

Date: May 2, 2025

Respectfully submitted,

/s/ Blake A. Bennett  
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*Counsel for Defendant Trans Union, LLC*